

Responses to Review of the Quality Assurance Project Plan, Field Sampling Plan, Site Management Plan and Health and Safety Plan for Old American Zinc Plant Site, Fairmont City, St. Clair County, Illinois

PREPARED FOR: Sheila Desai/U.S. Environmental Protection Agency
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CH2M HILL, Inc. (CH2M) prepared this memorandum in response to the U.S. Environmental Protection Agency (EPA) comments on the draft quality assurance project plan (QAPP), field sampling plan (FSP), and site management plan (SMP) received on May 16, 2017, via email and comments on the health and safety plan (HASP) received on May 23, 2017, via email. The following sections include the EPA comments and CH2M responses. For ease of review, each comment is presented in plain text, followed by the CH2M response in bold text.

EPA Comments on QAPP

1. Worksheets #3, #5, #9 – Please correct email for Sheila Desai to desai.sheila@epa.gov and the QAPP Reviewer to Alida Roberman, roberman.alida@epa.gov, 312-886-7185.

CH2M Response: Sheila Desai's email has been edited and Alida Roberman has been added.

2. Worksheet #9 – Update the months in schedule of activities.

CH2M Response: The months have been updated to reflect the current schedule.

3. Worksheet #10 – Site History, last paragraph – change the 2nd to last sentence to “The entity responsible for the PRP’s work filed for Chapter 11 bankruptcy and ceased performing additional work at the site in April 2016.”

CH2M Response: The text has been updated.

4. Worksheet #10 – The Problem to be addressed by the Project, page 15, paragraph 1 – The sampling also includes properties further West that were not sampled in the TCRA/RI as well as to the North versus just expanding east and south.

CH2M Response: The text has been updated.

5. Worksheet #13 – 2003 Removal Action Report should be included (unless you’re assuming it’s incorporated into the Remedial Investigation Report).

CH2M Response: The data source has been edited to include the 2003 Final Removal Action Report, and a reference to the report has been added.

6. Add Alida Roberman to signature page and provide EPA with a copy of the signature page after all parties have approved the QAPP for the record.

CH2M Response: Alida Roberman has been added to the signature page, and CH2M and laboratory signatures have been included in the final QAPP.

EPA Comments on FSP

1. Site History, last paragraph – change the 2nd to last sentence to “The entity responsible for the PRP’s work filed for Chapter 11 bankruptcy and ceased performing additional work at the site in April 2016.”

CH2M Response: The text has been updated.

EPA Comments on SMP

1. Name on SMP should be Old American Zinc Plant Site. The official name in SEMS/CERCLIS includes “Plant” in the title. Please correct in text as well for consistency.

CH2M Response: The SMP text has been updated to refer to the project as “Old American Zinc Plant Superfund Site.”

2. Section 1.1.2 - Site History, last paragraph – change the 2nd to last sentence to “The entity responsible for the potentially responsible party’s work filed for Chapter 11 bankruptcy and ceased performing additional work at the site in April 2016.”

CH2M Response: The text has been updated.

EPA Comments on HASP

1. Responsible Persons: Section 3.2 identifies the “Safety Coordinator”. In Section 6.1 and throughout the Plan, there are various references to the “SSC”, the “SCC” and the “SC”. Consistent terminology should be used.

CH2M Response: The text has been updated. All references to the “Site Safety Coordinator” use the acronym “SSC”.

2. Air Monitoring/PPE: Section 10.1 indicates the use of Level C “when action levels above are exceeded”, but Section 9.1 does not set an action level for upgrade.

CH2M Response: The OSHA PEL and Level C upgrade were added to the table in Section 9.1.

3. Site Control/Work Zones: Section 13.0 describes work zones, but does not indicate when and where Exclusion Zones will be established. Tasks include DPT drilling. At a minimum, an Exclusion Zone should be established as a demarked perimeter around each drilling location.

CH2M Response: The location has been updated to reflect the location for the exclusion zone, “Location: Individual properties and within a demarked perimeter at each drilling location” and that cones will be used to demarcate the zone.

4. Site Control/Buddy System: Section 13.0 says “Use of the buddy system will be implemented unless a Working Alone protocol has been established and approved as indicated in Sections 5 and 6 above”. Use of the buddy system is required in all Exclusion Zones.

CH2M Response: The text has been updated to confirm that the buddy system is required in all Exclusion Zones.

5. Site Control/Hygiene: There should be an express prohibition of eating, drinking, smoking, etc. in all Exclusion Zones.

CH2M Response: The following text has been added to Section 13, "Eating, drinking, and smoking are prohibited in all Exclusion Zones."